

EXHIBIT 2

From: Jaffre, Remi J.D. <RJaffre@jenner.com>
Sent: Friday, August 16, 2024 5:38 PM
To: Maggie Szewczyk; Bart, Andrew H.; Carrero, Jacquellena T.
Cc: Richard L. Brophy; Zachary C. Howenstine; iplitstaff; Ted Behm
Subject: RE: UMG v. RCN - Additional information regarding Category 1 documents [IWOV-IDOCS.FID3699945]

Maggie and Zach,

We have reviewed the information you provided on Tuesday concerning the 26 in camera documents RCN is continuing to withhold, but we do not see how this advances the ball towards an agreed resolution of our remaining privilege disputes. We continue to believe that further court intervention is necessary with respect to the documents that were not directly covered by the magistrate judge's ruling.

Relatedly, we still have not heard from you whether you re-reviewed Mr. Holanda's documents as part of the process of putting together your latest document production. Please let us know at your earliest convenience.

Thanks, and have a good weekend.

Rémi

Rémi J.D. Jaffré

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From: Maggie Szewczyk <MSzewczyk@atllp.com>
Sent: Tuesday, August 13, 2024 6:42 PM
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Cc: Richard L. Brophy <RBrophy@atllp.com>; Zachary C. Howenstine <ZHowenstine@atllp.com>; iplitstaff <iplitstaff@atllp.com>; Ted Behm <EBehm@atllp.com>
Subject: UMG v. RCN - Additional information regarding Category 1 documents [IWOV-IDOCS.FID3699945]

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Counsel,

Pursuant to the Stipulation agreed to by the parties and ordered by the Court, attached for service is a document containing additional information regarding the 26 Category 1 Documents the Court reviewed *in camera* and did not require RCN to produce to Plaintiffs.

Additionally, pursuant to section 12 of the Discovery Confidentiality Order, RCN is clawing back as privileged the following documents, which were inadvertently produced on July 26, 2024:

RCN30022239-RCN30022240
RCN30021246-RCN30021248
RCN30021897-RCN30021901
RCN30022187-RCN30022189
RCN30022147-RCN30022149
RCN30021167-RCN30021169

RCN requests that you destroy these documents.

Thanks,
Maggie



Armstrong Teasdale LLP

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